

Exhibit C

Declaration of Nick Horton

1. My name is Nick Horton. I am the Co-Executive Director of OpenDoors, a non-profit organization founded in 2003, whose sole mission is to provide services to people with criminal records.
2. OpenDoors operates a 14-unit housing facility at 700 Plainfield Street, Providence, Rhode Island, which provides a structured, transitional housing for formerly incarcerated individuals.
3. I serve as the House Manager for the Plainfield facility.
4. We currently have eight beds available that could house ICE detainees currently held at the Wyatt Detention Center in Central Falls, Rhode Island, who are released on bail in Yanes v. Martin, Case 1:20-cv-00216-MSM-PAS.
5. These beds are available for detainees for whom release to family members is unavailable or inappropriate, or while alternative release arrangements are being developed.
6. Released detainees could stay at our facility for up to six months.
7. OpenDoors has extensive experience providing housing for formerly incarcerated persons, including those with a history of violence and substance abuse.
8. The house will be staffed, at a minimum from 5:00 p.m. to 12:00 p.m. daily, with other staff present frequently throughout the day providing supervision and case management.
9. I have been informed about the background of Raul Mendoza Lopez, and I believe that OpenDoors presents an appropriate housing option for him if he is released from detention at Wyatt.
10. For persons in Mr. Mendoza's situation, OpenDoors prefers that he be subject to electronic monitoring.
11. If he is housed in our Plainfield facility, Mr. Mendoza would be assigned a case manager to help with his transition to living outside a carceral environment.
12. OpenDoors' Plainfield Avenue facility only accepts male tenants.
13. OpenDoors will help facilitate Mr. Mendoza's participation in a court-approved batterer's intervention program.
14. During the COVID-19 crisis, social distancing and other measures to prevent the spread of the virus are mandated within the facility.
15. During the COVID-19 crisis, no visitors are allowed in the Plainfield facility.

16. During the COVID-19 crisis, tenants will only be allowed to leave the premises for approved activities.
17. A complete set of house rules for the Plainfield facility is attached to my prior declaration submitted in this case at Docket No. 61-6.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of June, 2020, in Providence, Rhode Island

/s/ Nick Horton

Nick Horton